



## Golden 1 Credit Union CCPA Notice for California Residents

**Last Updated: January 9, 2024**

Golden 1 Credit Union ("Golden 1") has adopted this Privacy Notice for California Residents ("Notice") to comply with the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, "CCPA"). This Notice provides consumers with a description of our online and offline practices regarding the collection, use, disclosure, sale, sharing, and retention of personal information and sensitive personal information. Any terms defined in the CCPA have the same meaning when used in this Notice.

### **What Personal Information is Covered by this Notice?**

Personal information includes any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Most of the personal information Golden 1 collects is already regulated by federal and state laws and is exempt from the CCPA. For example, the CCPA does not apply to personal information collected or disclosed in connection with our provision of financial products or services that are used primarily for personal, family, or household purposes (e.g., consumer accounts), nor does it apply to certain personal information collected or disclosed pursuant to the Fair Credit Reporting Act. Please see our [Federal Consumer Privacy Policy](#) for information about how Golden 1 collects and uses personal information, including sensitive personal information (as defined in the CCPA), in connection with these financial products and services. This Notice addresses only Golden 1's collection and use of personal information that is not exempt from the CCPA and is not covered by our separate [CCPA notice to employees and job applicants](#).

### **Information We Collect and Use**

We have collected the categories of personal information and sensitive personal information listed below within the last 12 months. The table also lists, for each category, the business purposes for the information collection and whether we disclose the information for our business purposes and/or sell or share it with third parties for cross-context behavioral advertising.

Category of Personal Information Collected	How We Use It (Business Purpose(s) for Collection)	Disclosed/Sold/Shared?
Identifiers, such as a real name, alias, business name,	<ul style="list-style-type: none"><li>Performing services such as maintaining your account, providing</li></ul>	Disclosed to service providers and contractors (e.g., survey

Category of Personal Information Collected	How We Use It (Business Purpose(s) for Collection)	Disclosed/Sold/Shared?
business address, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, tax id, driver's license number, passport number, or other similar identifiers.	<p>customer service, or processing transactions.</p> <ul style="list-style-type: none"> <li>Assessing your qualifications for a financial product or service.</li> <li>Verifying your identity and contacting you regarding your account, application status or loan process.</li> <li>Auditing a current interaction with you (such as verifying ad impressions).</li> <li>Preventing and responding to security incidents and other malicious or illegal activity.</li> <li>Investigating and responding to complaints.</li> <li>Short-term, transient use (such as nonpersonalized advertising).</li> <li>Verifying or enhancing the quality or safety of our products and services.</li> <li>Providing information to you about our products and services.</li> <li>Advancing a commercial transaction (such as delivering targeted ads)</li> </ul>	<p>administrators; online advertising providers; business banking vendors; joint marketing partners) for the stated business purposes.</p> <p>Not sold or shared.</p>
<b>Personal information categories listed in California Civil Code 1798.80(e)</b> , such as a name, business name, signature, social security number, tax id, physical characteristics or description, address, business address, business ownership information, telephone number, passport number, driver's license or state identification card number, insurance policy number,	<ul style="list-style-type: none"> <li>Performing services such as maintaining your account, providing customer service, or processing transactions.</li> <li>Assessing your qualifications for a financial product or service.</li> <li>Verifying your identity and contacting you regarding your account, application status or loan process.</li> <li>Preventing and responding to security incidents and other malicious or illegal activity.</li> <li>Undertaking research and development.</li> <li>Verifying or enhancing the quality or safety of our products and services.</li> </ul>	<p>Disclosed to service providers and contractors (e.g., survey administrators; business banking vendors; joint marketing partners) for the stated business purposes.</p> <p>Not sold or shared.</p>

Category of Personal Information Collected	How We Use It (Business Purpose(s) for Collection)	Disclosed/Sold/Shared?
education, employment, employment history, bank account number, credit card number, debit card number, or other financial information.	<ul style="list-style-type: none"> <li>• Providing information to you about our products and services.</li> <li>• Advancing a commercial transaction (such as delivering targeted ads).</li> </ul>	
<b>Protected classification characteristics under California or federal law</b> , such as age, race, color, ethnicity, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.	<ul style="list-style-type: none"> <li>• Performing services such as maintaining your account, providing customer service, or processing transactions.</li> <li>• Undertaking research and development.</li> <li>• Verifying or enhancing the quality or safety of our products and services.</li> <li>• Complying with equal opportunity lending laws.</li> </ul>	<p>Disclosed to service providers and contractors (e.g., survey administrators; business banking vendors; joint marketing partners) for the stated business purposes.</p> <p>Not sold or shared.</p>
<b>Commercial information</b> , such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> <li>• Performing services such as maintaining your account, providing customer service, or processing transactions.</li> <li>• Auditing a current interaction with you (such as verifying ad impressions).</li> <li>• Short-term, transient use (such as nonpersonalized advertising).</li> <li>• Undertaking research and development.</li> <li>• Providing information to you about our products and services.</li> </ul>	<p>Disclosed to service providers and contractors (e.g., survey administrators; online advertising providers; business banking vendors; joint marketing partners) for the stated business purposes.</p> <p>Not sold or shared.</p>

Category of Personal Information Collected	How We Use It (Business Purpose(s) for Collection)	Disclosed/Sold/Shared?
	<ul style="list-style-type: none"> <li>Assessing your qualifications for a financial product or service.</li> </ul>	
<b>Biometric information</b> , such as fingerprints, photographs, facial or voice recognition.	<ul style="list-style-type: none"> <li>Performing services such as maintaining your account, providing customer service, or processing transactions.</li> <li>Verifying your identity and maintaining security.</li> </ul>	Disclosed to service providers and contractors (e.g., business banking vendors) for the stated business purposes.  Not sold or shared.
<b>Internet or other similar network activity</b> , such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	<ul style="list-style-type: none"> <li>Auditing a current interaction with you (such as verifying ad impressions).</li> <li>Preventing and responding to security incidents and other malicious or illegal activity.</li> <li>Debugging errors.</li> <li>Short-term, transient use (such as nonpersonalized advertising).</li> <li>Advertising and marketing to you.</li> </ul>	Disclosed to service providers and contractors (e.g., online advertising providers) for the stated business purposes.  Not sold or shared.
<b>Geolocation data</b> , such as physical location or movements.	<ul style="list-style-type: none"> <li>Performing services such as maintaining your account, providing customer service, or processing transactions.</li> <li>Auditing a current interaction with you (such as verifying ad impressions).</li> <li>Preventing and responding to security incidents and other malicious or illegal activity.</li> <li>Short-term, transient use (such as nonpersonalized advertising).</li> <li>Advertising or marketing to you.</li> </ul>	Disclosed to service providers and contractors (e.g., online advertising providers; business banking vendors; joint marketing partners) for the stated business purposes.  Not sold or shared.
<b>Sensory data</b> , such as audio, electronic, visual, or similar information.	<ul style="list-style-type: none"> <li>Preventing and responding to security incidents and other malicious or illegal activity.</li> <li>Performing services such as maintaining your account, providing customer service, or processing transactions.</li> </ul>	Disclosed to service providers and contractors (e.g., survey administrators; business banking vendors) for the stated business purposes.

Category of Personal Information Collected	How We Use It (Business Purpose(s) for Collection)	Disclosed/Sold/Shared?
	<ul style="list-style-type: none"> <li>Verifying or enhancing the quality or safety of our products and services.</li> </ul>	Not sold or shared.
<b>Professional or employment-related information</b> , such as current or previous employers, occupation title, income, and business history.	<ul style="list-style-type: none"> <li>Performing services such as maintaining your account, providing customer service, or processing transactions.</li> <li>Preventing and responding to security incidents and other malicious or illegal activity.</li> <li>Assessing your qualifications for a financial product or service and establishing current or historical income trends.</li> </ul>	<p>Disclosed to service providers and contractors (e.g., business banking vendors) for the stated business purposes.</p> <p>Not sold or shared.</p>
<b>Inferences drawn from other personal information</b> , such as a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior attitudes, intelligence, abilities, and aptitudes.	<ul style="list-style-type: none"> <li>Performing services such as maintaining your account, providing customer service, or processing transactions.</li> <li>Short-term, transient use (such as nonpersonalized advertising).</li> <li>Advancing a commercial transaction (such as delivering targeted ads).</li> </ul>	<p>Disclosed to service providers and contractors (e.g., online advertising providers) for the stated business purposes.</p> <p>Not sold or shared.</p>
<b>Sensitive personal information</b>	See separate table below.	See separate table below.

Category of Sensitive Personal Information Collected	How We Use It (Business Purpose(s) for Collection)	Disclosed/Sold/Shared?
<b>Government identifiers</b> , such as social security, driver's license, state identification card, or passport number.	<ul style="list-style-type: none"> <li>Performing services such as maintaining your account, providing customer service, or processing transactions.</li> <li>Assessing your qualifications for a financial product or service.</li> <li>Verifying your identity and contacting you regarding your</li> </ul>	<p>Disclosed to third parties (e.g., survey administrators; business banking vendors) for the stated business purposes.</p> <p>Not sold or shared.</p>

Category of Sensitive Personal Information Collected	How We Use It (Business Purpose(s) for Collection)	Disclosed/Sold/Shared?
	account, application status or loan process. <ul style="list-style-type: none"> <li>• Preventing and responding to security incidents and other malicious or illegal activity.</li> </ul>	
<b>Account access credentials</b> , such as account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.	<ul style="list-style-type: none"> <li>• Performing services such as maintaining your account, providing customer service, or processing transactions.</li> <li>• Preventing and responding to security incidents and other malicious or illegal activity.</li> </ul>	Disclosed to third parties (e.g., business banking vendors) for the stated business purposes.  Not sold or shared.
<b>Precise geolocation</b> such as physical location, and movements.	<ul style="list-style-type: none"> <li>• Performing services such as maintaining your account, providing customer service, or processing transactions.</li> <li>• Short-term, transient use (such as nonpersonalized advertising).</li> </ul>	Disclosed to third parties (e.g., business banking vendors) for the stated business purposes.  Not sold or shared.
<b>Racial or ethnic origin</b> Such as citizenship, immigration status, religious or philosophical beliefs, or union membership.	<ul style="list-style-type: none"> <li>• Complying with equal opportunity lending laws.</li> </ul>	Disclosed to third parties (e.g., business banking vendors) for the stated business purposes.  Not sold or shared.
<b>Unique identifying biometric information</b> , such as imagery of iris, retina, fingerprint, face, hand, palm, vein patterns, voice recordings, keystroke patterns or rhythms, gait, or voice pattern.	<ul style="list-style-type: none"> <li>• Performing services such as maintaining your account, providing customer service, or processing transactions.</li> <li>• Verifying your identity and maintaining security.</li> </ul>	Disclosed to third parties (e.g., business banking vendors) for the stated business purposes.  Not sold or shared.

We obtain the personal information and sensitive personal information listed above from the following categories of sources:

- Directly from you, such as when you provide information to us to apply for or open a business account, loan, or other business-related service; engage in our live agent chat; engage or post on our social media platforms; enter sweepstakes or contests; participate in a focus group; or apply for a scholarship
- Indirectly from you, such as from observing your interactions on our website or at our branches
- Third-party business partners, such as joint marketing partners, analytics providers, and verification services
- Public records
- Government entities
- Data aggregators

### **Disclosure or Sale of Personal Information**

Golden 1 may disclose your personal information, including sensitive personal information, to our service providers and contractors for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to keep that information confidential and not use it for any purpose except performing the contract. Within the preceding 12 months, we have disclosed personal information to service providers and contractors for a business purpose as identified in the chart above. We will not use or disclose your personal information or sensitive personal information for purposes other than those outlined in this notice.

Within the preceding 12 months, Golden 1 has not sold personal information, including personal information of minors under the age of 16, to any third parties or shared it with third parties for cross-context behavioral advertising.

### **Retention of Personal Information**

We will retain your personal information, including sensitive personal information, only for as long as necessary to achieve the disclosed business purposes. We will determine the specific retention period depending on applicable legal requirements, the sensitivity of the information, and whether our use is one-time (e.g., processing your sweepstakes entry) or recurring (e.g., servicing your business account with us).

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their information. This section describes your rights and explains how to exercise them.

#### **Right to Know and Access**

You have the right to request that Golden 1 disclose certain information to you about our collection and use of your personal information, including sensitive personal information, over the past 12 months. Once we receive and confirm your verifiable request, and confirm the information you seek is covered by the CCPA, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information was collected;
- Our business purpose for collecting, selling, or sharing that personal information;
- The categories of third parties (if any) to whom we disclosed that personal information and the categories of personal information that were disclosed;
- The categories of third parties (if any) to whom we sold or shared that personal information, and the categories of personal information that were sold or shared; and
- The specific pieces of personal information we collected about you.

### **Right to Delete**

You have the right to request that Golden 1 delete any of your personal information, including sensitive personal information, that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, and confirm the information you request be deleted is covered by the CCPA, we will delete (and direct any service providers or contractors to whom we disclosed the information to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) or contractor(s) to:

- Complete the transaction for which we collected the personal information, provide a service you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products or services to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed research in the public interest;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.



## **Right to Correct Inaccurate Information**

You have the right to request that Golden 1 correct any inaccurate personal information, including sensitive personal information, that we collected from you and retained, considering the nature of the personal information and the purpose of processing the information, subject to certain exceptions. Once we receive and confirm your verifiable request and confirm the information you request to be corrected is covered by the CCPA, we will correct (and will direct any service providers or contractors to whom we disclose the information to correct) your personal information, unless an exception applies.

We may deny your request to correct if we determine that the contested personal information is more likely than not accurate based on the totality of the circumstances.

If you want to correct personal information contained in financial account documents, please contact us at 1-877-GOLDEN 1 (1-877-465-3361) or visit a branch. We are not able to update or modify official account records or systems through this CCPA correction request process.

## **Exercising Your Rights**

To exercise the rights described above, please submit a verifiable request to us by:

- Calling us at 1-877-GOLDEN 1 (1-877-465-3361);
- Visiting [www.golden1.com/terms-and-conditions/california-consumer-privacy-policy](http://www.golden1.com/terms-and-conditions/california-consumer-privacy-policy) to complete and submit the CCPA Request Form; or
- Visiting a Golden 1 branch to complete and submit a request form.

You may make a verifiable request to know twice within a 12-month period. The verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or the authority of your agent to make the request (if applicable) and confirm the personal information relates to you. Making a verifiable request does not require you to create an account with us. We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.

Only you or an authorized agent may make a verifiable request related to your personal information.

- When an authorized agent submits a request on your behalf, we may require proof that you gave the agent signed permission to submit the request, such as a power of attorney or other signed authorization.

- If your authorized agent does not have a valid power of attorney, we may also require that you verify your identity directly with us and confirm directly with us that you provided the agent permission to submit the request on your behalf.

If you are an Authorized Agent acting on behalf of a California resident, please complete the [California Consumer Privacy Act Authorized Agent Form](#) and submit it along with your CCPA request by visiting your local branch, emailing it to [CCPA@golden1.com](mailto:CCPA@golden1.com), or mailing it to:

Golden 1 Credit Union  
Attn: Records  
PO Box 15966 Sacramento,  
CA 95852-0966

We must receive the completed California Consumer Privacy Act Authorization Agent Form within 7 days of receiving your verifiable request, or the request will be denied.

### **Response Timing and Format**

We will attempt to respond to a verifiable request within 45 days of its receipt. If we require more time, we will inform you in writing of the reason and extension period. The response we provide will also explain the reason(s) we cannot comply with a request, if applicable. We do not charge to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a monetary charge, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Right of No Retaliation Following Exercise of Rights**

We will not discriminate against you for exercising any CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you products or services;
- Charge you different prices or rates for products or services, including through granting discounts or other benefits; or imposing penalties;
- Provide you a different level or quality of product or service; or
- Suggest that you may receive a different price or rate for products or services or a different level or quality of products or services

We may offer you certain financial incentives permitted by the CCPA. Any CCPA-permitted financial incentive we offer will reasonably relate to the value of your personal information and contain written terms that describe the program's material aspects, which we will provide to you at the time we offer the incentive. Participation in a financial incentive requires your opt-in consent, which you may revoke at any time.

### **Changes to Our CCPA Privacy Notice**

Golden 1 reserves the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will post the updated Notice on our Website and update its effective date. **Your continued use of our Website or other facilities following posting of changes constitutes your acceptance of such changes.**

### **Contact Information**

If you have any questions about this Notice, the ways in which Golden 1 collects and uses your information, or your choices and rights regarding such use, or wish to make a CCPA request, please contact us by:

- Calling us at 1-877-GOLDEN 1 (1-877-465-3361);
- Visiting [www.golden1.com/terms-and-conditions/california-consumer-privacy-policy](https://www.golden1.com/terms-and-conditions/california-consumer-privacy-policy); or
- Visiting a Golden 1 branch

If you have a disability that makes it difficult to access this notice contact us at the above toll-free number to access the notice in an alternative format; or If you wish to print a copy of this policy, it is available as a searchable pdf document at the link below.

<https://www.golden1.com/-/media/golden1/Site-documents/disclosures/a-78>